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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LYRICFIND, INC.,

Plaintiff,

v.

MUSIXMATCH S.P.A. and
TPG GLOBAL, LLC,

Defendants.

Case No. 3:25-cv-02265-JSC

**STIPULATION AND [PROPOSED]
ORDER REGARDING
LIMITATIONS ON DEPOSITIONS**

Hon. Jacqueline Scott Corley

1 Pursuant to Civil Local Rule 7-12, Plaintiff LyricFind, Inc. (“LyricFind”) and Defendants
2 Musixmatch, S.p.A. (“Musixmatch”) and TPG Global, LLC (“TPG”) (together, “Defendants”)
3 (collectively with LyricFind, the “Parties”), through their respective counsel of record, hereby
4 stipulate regarding the amount of deposition testimony that the Parties may take of fact witnesses in
5 this litigation without further leave of Court.

6 WHEREAS, on October 15, 2025, the Parties submitted a Joint Case Management Statement,
7 ECF No. 82, which included the Parties’ respective proposals for the amount of fact deposition time
8 that the Parties may take in this action without further leave of Court.

9 WHEREAS, during the Case Management Conference on October 22, 2025, the Court noted
10 that since the Parties did not reach complete agreement on deposition limitations, the default rules
11 would apply absent a further agreement between the parties. Oct. 22, 2025 Hr’g Tr. at 4:24-5:8;

12 WHEREAS on October 23, 2025 the Court issued Pretrial Order No. 1: Schedule, ECF No.
13 89, which did not set deposition limitations separate from the default rules under the Federal Rules of
14 Civil Procedure;

15 WHEREAS, the Parties believe that additional fact deposition time should be permitted in this
16 action given its scope and complexity and have agreed to stipulate to new deposition limitations;

17 NOW, THEREFORE, pursuant to Local Rules 7-12, by and through their respective counsel
18 of record and subject to the Court’s approval, the Parties hereby stipulate and agree as follows:

- 19 1. LyricFind may take 100 hours of fact deposition time of Defendants, inclusive of Fed. R.
20 Civ. P. 30(b)(6) depositions, subject to a seven-hour limit per deposition.
- 21 2. Defendants may take 100 hours of fact deposition time of LyricFind, inclusive of Fed. R.
22 Civ. P. 30(b)(6) depositions, subject to a seven-hour limit per deposition.
- 23 3. There shall be no limitation on the number of fact depositions that the Parties may take of
24 nonparty witnesses.
- 25 4. Except as expressly provided herein, the Parties reserve all rights under the Federal Rules
26 of Civil Procedures to object to the scope, timing, or propriety of any deposition.
- 27 5. The Parties reserve the right to seek leave of Court to take additional fact depositions
28 beyond the limitations set forth above.

IT IS SO STIPULATED.

Dated: December 11, 2025

/s/ Ben Steinberg
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Respectfully submitted,

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Jacqueline Scott Corley
United States District Judge